

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**VIKRAM P. GROVER, d/b/a
“IX ADVISORS” a/k/a “IXA”**

Plaintiff,

v.

**NET SAVINGS LINK, INC.,
WILTON GROUP, LIMITED,
WILTON UK (GROUP) LIMITED,
CHINA FOOD AND BEVERAGE CO.,
JAMES TILTON, and
JOHN DOES 1-100**

Defendants.

Civil Action No 1:21-cv-5054

**DEFENDANTS’ NET SAVINGS LINK, INC. AND JAMES TILTON’S MOTION TO
WITHDRAW AS COUNSEL**

COMES NOW Defendants, NET SAVINGS LINK, INC. (“NSAV”) and JAMES TILTON (“Tilton”) (collectively referred to as “Defendants”) by and through their attorneys, COLE SADKIN, LLC and with respect to their Motion to Withdraw, so states the following:

1. On August 15, 2024, Mr. Cole filed his appearance on behalf of Defendants NSAV and Tilton.

2. Mr. Cole has attempted to confer with Defendants regarding settlement discussions and negotiations, but has failed to receive meaningful instruction or authority from the Defendants.

3. Due to irreconcilable differences and a breakdown in the attorney-client relationship, Mr. Cole requests this Motion to Withdraw. Mr. Cole emailed Defendants a copy of this Motion and instructed Defendants to be advised by this Court regarding their options moving

forward.

4. Mr. Cole also emailed a copy of this Motion to Plaintiff's counsel, but Mr. Cole has not determined whether Plaintiff opposes this present withdrawal.

5. This motion is not intended to cause any undue delay in the proceeding or to cause prejudice to the Plaintiff or other parties.

6. Pursuant to Judge Rowland's November 7, 2024 Minute Order, Defendants have until November 25, 2024 to file objections to the Temporary Receiver's Report.

7. Therefore, counsel requests that the law firm of Cole Sadkin, LLC and all of their appeared attorneys are withdrawn from this matter; and that Defendants are allotted time up to and including sixty (60) days from today's date until January 13, 2025, to secure new representation.

8. Further, this Motion is not for the purposes of delay, and with the granting of such relief Plaintiff would not be prejudiced in any way.

WHEREFORE, Defendants, NET SAVINGS LINK, INC. and JAMES TILTON, by and through their counsel, COLE SADKIN, LLC, respectfully requests that this Court grant this Motion to (1) withdraw the law firm of Cole Sadkin LLC and its attorneys, and (2) allow Plaintiff sufficient time until January 13, 2025 in order to secure new counsel. Lastly, Defendants humbly request any other such relief, just, proper, and equitable in the premises.

Dated November 18, 2024

Respectfully submitted,

By: /s/ Mason S. Cole
One of Defendants' Attorneys

COLE SADKIN LLC
Mason S. Cole, ARDC No. 6307727
1652 W. Belmont Ave., Ste. 1
Chicago, Illinois 60657

T: (312) 548-8610

mcole@colesadkin.com

Counsel for Defendants NSAV and Tilton